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CLERK US DISTRICT COURT
DISTRICT OF NEVADA

BY _____ DEPUTY

1 **ANSW**

2 RONALD A. COLQUITT, ESQ. CHTD.

3 RONALD A. COLQUITT, ESQ.

4 Nevada Bar No. 004953

5 321 S. Casino Center Blvd., #112

6 Las Vegas, Nevada 89101

7 (702) 384-1000

8 ronslawoffice@gmail.com

9 Defendant in Proper Person

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 JOSEPH EUGENE PIOVO, INDIVIDUALLY
13 AND AS BENEFICIARY OF VICE ROY
14 UNITED NATIONS CREDIT AND
15 COMMERCE INTERNATIONAL BLIND
16 TRUST.

CASE No. 2: 13-cv-01922-APG--GWF

17 Plaintiffs,

18 v.

19 RONALD A. COLQUITT, et al.

20 Defendant.

21 **ANSWER**

22 COMES NOW, Defendant, RONALD A. COLQUITT, ESQ., and hereby answers

23 Plaintiff's Second Amended Complaint on file herein as follows:

24 **INTRODUCTIONS AND PARTIES**

25 1. Answering Paragraphs 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 13, 15, 16, 18, 21, 22, 25, 27,
26 31, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63,
27 64, 65, 66, 67, 69, 70, 71, 72, 73, 74, 75, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91,
28 92, 93, 94, 95 and 96 of Plaintiff's Second Amended Complaint on file herein, this answering
Defendant is without sufficient knowledge as to the truth or falsity of the statements contained
therein and therefore denies the same.

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2. Answering Paragraph 3 of Plaintiff's Complaint on file herein, this answering Defendant admits that he is an attorney licensed in Nevada, but denies each and every other allegation contained therein.

3. Answering Paragraphs 12, 14, 17, 19, 20, 23, 24, 26, 28, 29, 30, 32, 33, 34, 35, 36, 37, 38, 68, 76 and 10 of Plaintiff's Complaint on file herein, this answering Third Party Defendant denies each and every allegation contained therein.

FIRST CLAIM/CAUSE OF ACTION

4. Answering Paragraph 1 on Page 56 of Plaintiff's Second Complaint on file herein, this answering Defendant repeats and realleges the answers to Paragraphs 1 through 96, above, as though fully set forth herein.

5. Answering Paragraph 2, 3 and 4 of Plaintiff's Complaint on file herein, this answering Defendant is without sufficient knowledge as to the truth or falsity of the statements contained therein and therefore denies the same.

6. Any and all allegations not specifically addressed above are hereby denied.

AFFIRMATIVE DEFENSES


1. Defendant hereby incorporates by reference those affirmative defenses enumerated NRCP 8 as though fully set forth herein, as applicable upon discovery. In the event further investigation or discovery reveals the applicability of any such defenses, Defendants reserve the right to seek leave of Court to amend this Answer to more specifically assert any such defense. Such defenses are herein incorporated by reference for the specific purposes of not waiving any such defenses, including without limitation, accord and satisfaction, arbitration and award, assumption of risk, contributory negligence, discharge in bankruptcy, duress, estoppel, failure of consideration, fraud, illegality, injury by fellow servant, laches, license, payment, release, res judicata, statute of frauds, statute of limitations and waiver.

2. All possible affirmative defenses may not have been alleged herein insofar as sufficient facts were not available after reasonable inquiry upon filing of this Answer. Therefore, Defendant reserves the right to amend this Answer to allege additional affirmative defenses and claims, counter-claims, cross-claims or third-party claims, as applicable, upon further investigation and discovery.

WHEREFORE, this Defendant prays as follows:

1. That Plaintiff take nothing by way of his Complaint on file herein;
2. That Defendant be awarded costs and fees incurred in the defense of this frivolous action;
3. For such other and further relief as the court deems appropriate.

DATED this 15th day of October, 2014.



RONALD A. COLQUITT, ESQ.
Nevada Bar No. 004953
321 S. Casino Center Blvd., #112
Las Vegas, Nevada 89101
(702) 384-1000
Defendant in Proper Person

CERTIFICATE OF SERVICE

A Copy of this Motion to Dismiss was mailed to the Plaintiff, Joseph Eugene Piovo, to the following address on the 15TH day of October, 2014:

1853 Indian Bend
Henderson, NV 89074.

Further, copies of this Motion to Dismiss were electronically served on all parties of record on this 15th day of Octoberr, 2014.


RONALD COLQUITT,
Defendant in Proper Person